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Before the
Federal Communications Commission
Washington, D.C. 20554

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APR - 1 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Provision of Directory Listing Information)	CC Docket No. 99-273
Under the Communications Act of 1934)	
As Amended)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	
)	
Administration of the North American)	CC Docket No. <u>92-237</u> /
Numbering Plan)	

Comments of Illuminet, Inc.

Illuminet, Inc. ("Illuminet") hereby files these comments in response to the January 9, 2002 Notice of Proposed Rulemaking, FCC 01-384, issued by the Federal Communications Commission ("Commission") in the above-captioned proceedings. Among other matters, the Commission seeks comments on Illuminet's proposal to utilize the Line Information Database ("LIDB") platform for "411" directory assistance ("DA") presubscription, assuming such presubscription is implemented. See NPRM at para. 29. To avoid burdening the record, Illuminet hereby incorporates, by reference, its comments and reply comments filed in response to the Commission's April 27, 2000 Public Notice requesting comments on the Telegate, Inc. ("Telegate") proposal for implementing 411 presubscription. See Public Notice, DA 00-930, released April 27, 2000. For the

reasons stated below¹, Illuminet respectfully submits that, should the Commission first find that presubscription of DA would advance the public interest, the existing LIDB platform with minor modifications should be relied upon to implement that directive.

Illuminet, a wholly owned subsidiary of VeriSign, Inc. provides a wide variety of services to local exchange carriers, interexchange carriers, wireless carriers and competitive local exchange carriers. Illuminet's services include, among others, Signaling System No. 7 network functions and related LIDB services, calling card billing validation services, 8xx database services and message clearinghouse services.

The Commission has correctly reflected Illuminet's position regarding the efficient deployment of presubscribed DA services based on current and proven network technology associated with the existing LIDB platform. As previously demonstrated in Illuminet's comments, LIDB service is already deployed throughout the network providing a demonstrated history of responding to competitive opportunities and the resulting requirements for LIDB-related service applications. There is, therefore, no need to "reinvent the wheel." With minor modifications including the addition of a new data element to the existing LIDB protocol and possible capacity upgrades for query capacity and/or data storage capacity, the LIDB platform will provide a more flexible, quickly deployed and less costly solution for DA presubscription than that proposed by Telegate.² Industry standards committees would only have to identify a new LIDB protocol data element to identify the "411" DA Service Provider, and that data element would then have to be installed in LIDB administration systems and databases. Additionally, a query

¹ Illuminet again limits its comments to the technical and implementation issues associated with the appropriate database platform that should be used to implement DA presubscription, assuming such DA presubscription is found to be in the public interest.

² Attachment A to these comments illustrates the methods and key points of using the existing LIDB platform to provide presubscribed DA services.

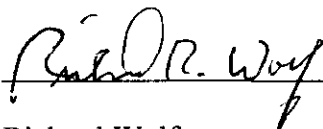
type (such as GetData, OLNS or some other industry standard) would have to be deployed, although Illuminet notes that most LIDBs have GetData and/or OLNS ability today and either could be used to provide presubscribed DA. Illuminet anticipates that these incremental adaptations required to utilize LIDB for presubscribed DA will be significantly less expensive and faster to deploy than Telegate's proposal to add new Signal Transfer Points and Service Control Points to the existing network. Accordingly, if the Commission finds that DA presubscription advances the public interests, Illuminet respectfully requests that the LIDB platform (with the modifications suggested herein) be used to implement that directive. Finally, Illuminet provides these comments with respect to the Commission's questions regarding the control over and administration of the LIDB platform in the event the Commission decides to implement 411 presubscription. See NPRM at para. 29. Illuminet sees no reason to alter the present LIDB database administration. All carriers presently have access to a LIDB database and each local exchange carrier maintains its customer line level information in the LIDB that can then be accessed by other carriers who need that information in the provision of services to their customers. This administration system allows for great flexibility for the local exchange carrier and for other carriers to provide service alternatives and options that enhances the available alternatives for service to their customers. As such, adding a new, duplicative, layer of LIDB database maintenance/administration for 411 presubscribed information and requiring new procedures to download into the existing LIDB databases would not improve or enhance the usefulness of LIDB-based presubscribed DA service. Rather, any new system would only increase the costs and time of deploying a LIDB-based 411 presubscription directive. Therefore, until it can be

demonstrated that access to or updating of the 411presubscription data in the LIDB databases through the present procedures raises concerns or inhibits the growth of 411 presubscription, Illuminet respectfully submits that there is no need to amend or modify the existing LIDB administration procedures to implement DA presubscription.

While Illuminet offers no opinion on whether DA presubscription service is in the public interest, it is our view that LIDB offers a simple, proven reliable, technically feasible and economically efficient method of implementing DA presubscription. Accordingly, Illuminet respectfully submits that the LIDB platform, with the minor modifications identified herein, should be used to implement DA presubscription should the Commission find that such service advances the public interest.

Respectfully submitted,

Illuminet, Inc.

By: _____

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April 1, 2002



Attachment A to the Comments of Illuminet for CC Docket No. 99-273

DA PIC

April 1, 2002



Description

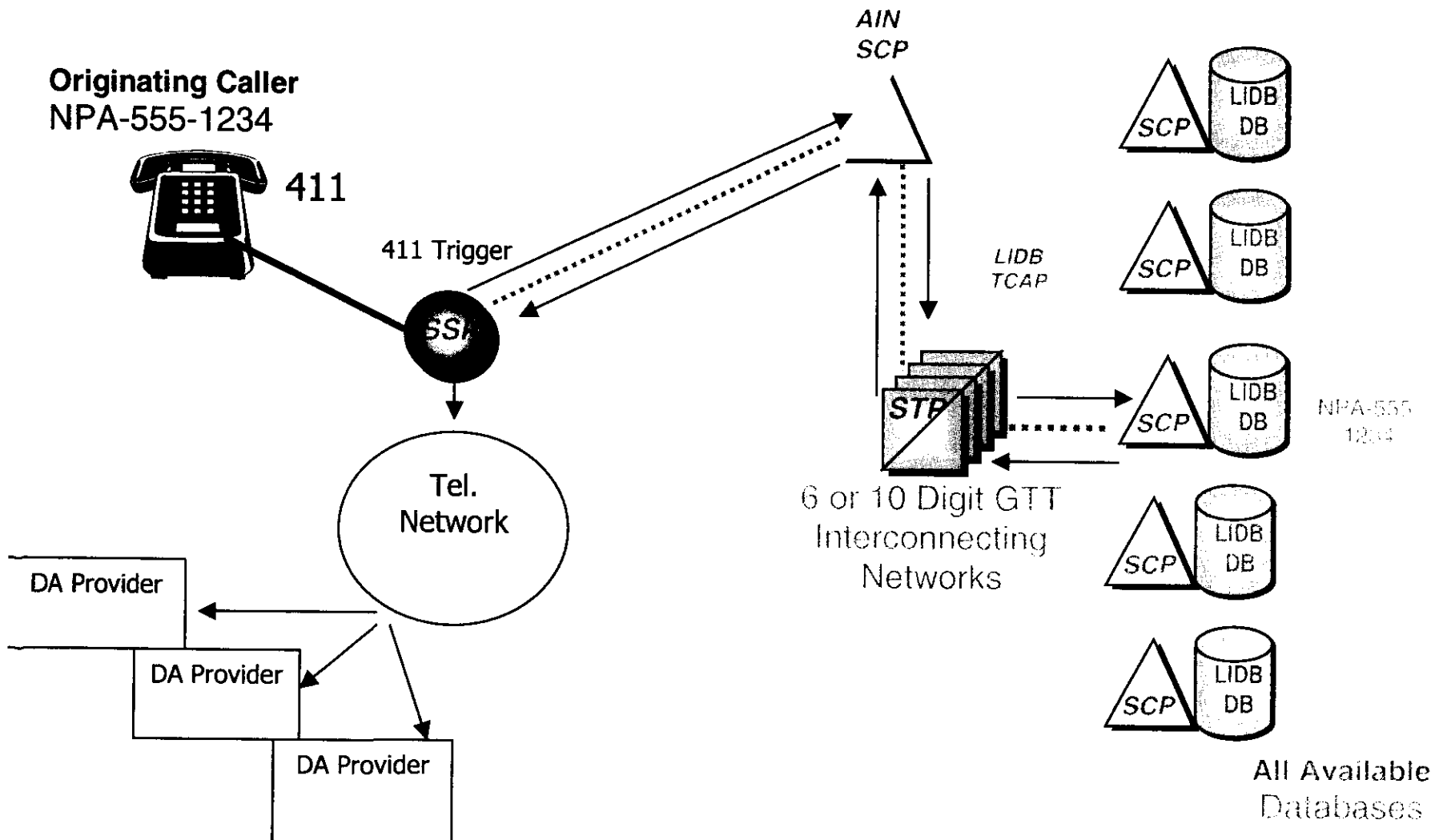
- DA PIC enables an end-user to PIC their preferred Directory Assistance Provider as opposed to automatically defaulting to the Directory Assistance Provider of their local telephone company's choice.



Call Flow (Wireline)

1. The wireline caller dials 411.
2. The 411 trigger capable switch suspends the call and sends a TCAP query to the AIN platform. The AIN platform launches a query based on the originating line number to the STP, which does Global Title Translation and routes the query to the appropriate LIDB.
3. The LIDB responds with the originating 10 digit line number's DA Service Provider ID and any other information (e.g., Service and/or Equipment Indicator, Account Owner, DA restrictions, etc.) required for proper call processing and billing.
4. Upon receipt of the response to the query the SSP then uses the returned routing information to route the call to the subscribers' selected DA provider.

How it works (wireline)



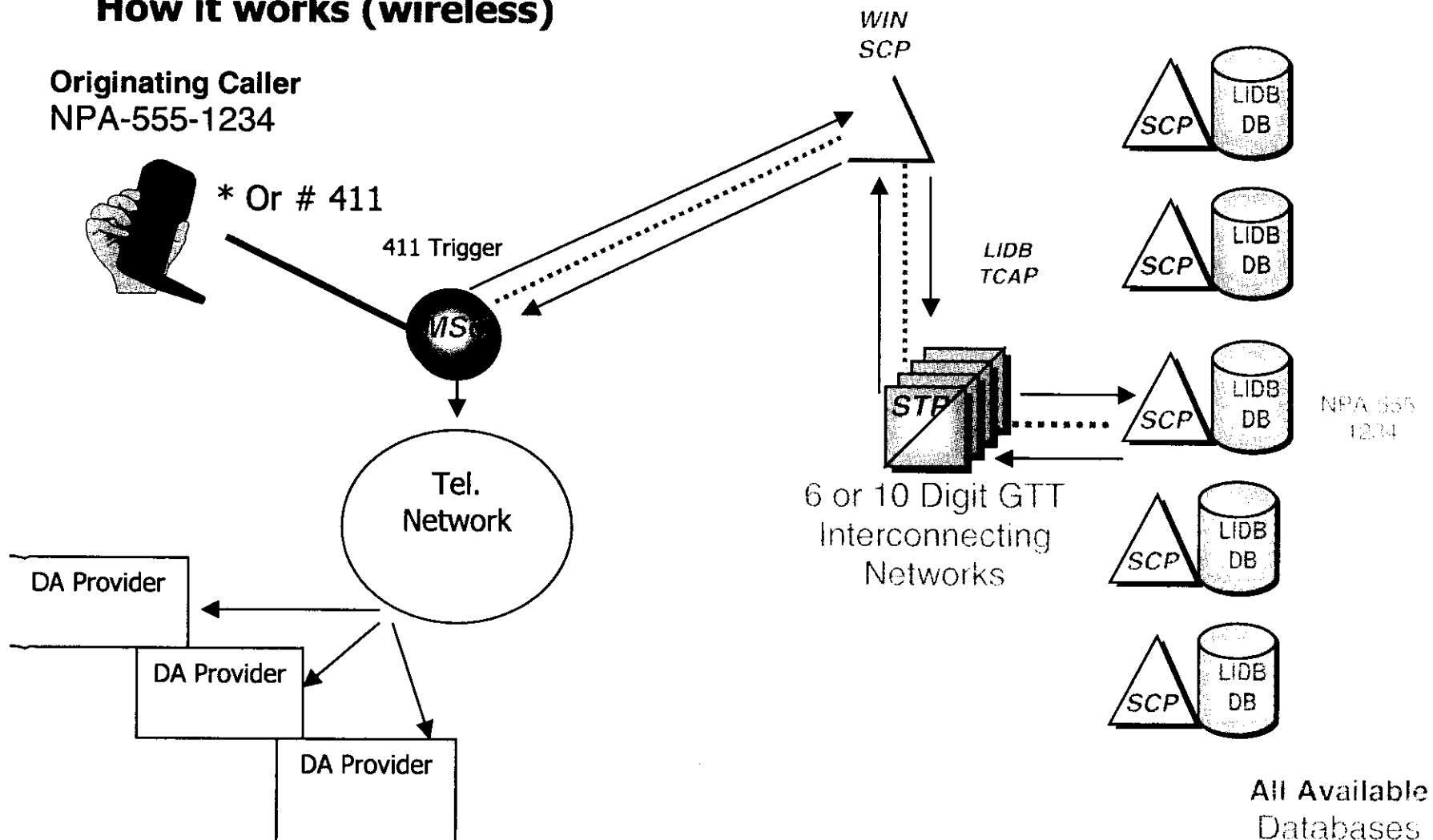


Call Flow (Wireless)

1. The wireless caller dials * or # 411.
2. The 411 trigger capable switch suspends the call and sends a TCAP query to the WIN platform. The WIN platform launches a query based on the originating line number to the STP, which does Global Title Translation and routes the query to the appropriate LIDB.
3. The LIDB responds with the originating 10 digit line number's DA Service Provider ID and any other information (e.g., Service and/or Equipment Indicator, Account Owner, DA restrictions, etc.) required for proper call processing and billing.
4. Upon receipt of the response to the query the MSC then uses the returned routing information to route the call to the subscribers' selected DA provider.

How it works (wireless)

Originating Caller
NPA-555-1234





DA PIC Admin. Flow

End-user's DA PIC information is administered the same way other LIDB/CNAM type information is administered at the phone company today.

- The information is generally plugged into an existing service order system.
- The service order system then strips out the information that is needed for the LIDB Administration system.
- The LIDB administration system then posts the information to the SCPs, or call processing databases, where it can be queried by end-offices/mobile switching centers for DA PIC call routing information.

CERTIFICATE OF SERVICE

I, Naomi Adams, do hereby certify that on this 1st day of April, 2002, a copy of the foregoing "Comments of Illuminet, Inc." were hand delivered to the following:


Naomi Adams

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